

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION**

**JAMES EDWARD BROGDON, JR.,
et al.,**

Plaintiffs,

v.

FORD MOTOR COMPANY,

Defendants

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO.

4:23-cv-00088-CDL

**STATE OF GEORGIA’S NOTICE OF CLAIM TO JUDGMENT
PURSUANT TO O.C.G.A. § 51-12-5.1(e)**

The State of Georgia, by and through counsel, Christopher M. Carr, Attorney General for the State of Georgia, files this notice of claim asserting its right to the judgment in the above-styled matter awarding punitive damages pursuant to O.C.G.A. § 51-12-5.1(e). On February 14, 2025, this Court entered an order and judgment awarding punitive damages in the amount of \$2.5 billion against Defendant Ford Motor Company. The State is a judgment creditor to seventy-five percent of those punitive damages, less a proportionate part of the costs of litigation. *See* O.C.G.A. § 51-12-5.1(e)(2).

To protect the State’s interests conferred by O.C.G.A. § 51-12-5.1(e)(2), the State files this notice to notify the Court and protect its interests. Further, the State would request it be apprised of any and all post-judgment proceedings and negotiations between the parties, including any potential mediations, to make sure this award of punitive damages is not circumvented and is distributed between the Plaintiffs and the citizens of Georgia according to the statutory framework.

Respectfully submitted, this 12th day of May, 2025.

CHRISTOPHER M. CARR 112505
Attorney General

LOGAN B. WINKLES 136906
Deputy Attorney General

RONALD J. STAY 621732
Senior Assistant Attorney General

/s/Adam W. D'Anella
Adam W. D'Anella 153016
Assistant Attorney General
Counsel for State of Georgia

PLEASE ADDRESS ALL
COMMUNICATIONS TO:

Adam W. D'Anella
Assistant Attorney General
Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
(404) 458-3536
adanella@law.ga.gov

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

James E. Butler, Jr., Esq.
Ramsey B. Prather, Esq.
Daniel E. Philyaw, Esq.
Allison Bailey, Esq.
BUTLER PRATHER LLP
105 13th Street
Post Office Box 2766
Columbus, GA 31902
jim@butlerprather.com
ramsey@butlerprather.com
dan@butlerprather.com
allison@butlerprather.com

Larae Dixon Moore, Esq.
PAGE SCRANTOM SPROUSE TUCKER & FORD
1111 Bay Avenue, 3rd Floor
P.O. Box 1199
Columbus, GA 31902
lmoore@pagescrantom.com

Frank M. Lowrey, IV, Esq.
Michael B. Terry, Esq.
BONDURANT MIXON & ELMORE LLP
1201 West Peachtree Street NW, Suite 3900
Atlanta, GA 30309
lowrey@bmelaw.com
terry@bmelaw.com

Michael R. Boorman
Georgia Bar No.: 067798
Philip A. Henderson
Georgia Bar No.: 604769
WATSON SPENCE LLP
999 Peachtree Street NE, Suite 1130
Atlanta, GA 30309
mboorman@watsonspence.com
phenderson@watsonspence.com

Paul F. Malek
HUIE, FERNAMBUCQ & STEWART LLP
3291 US Highway 280, Suite 200
Birmingham, AL 35243
pmalek@huielaw.com

Elizabeth B. Wright
THOMPSON HINE LLP
3900 Key Center Case
127 Public Square
Cleveland, OH 44114
elizabeth.wright@thompsonhine.com

Charles E. Peeler
Georgia Bar No.: 570399
Harold D. Melton
Georgia Bar No.: 501570
TROUTMAN PEPPER HAMILTON
SANDERS LLP
600 Peachtree Street, N.E., Suite 3000
Atlanta, GA 30308-2216
harold.melton@troutman.com
charles.peeler@troutman.com

Michael W. Eady
THOMPSON, COE, COUSINS &
IRONS, LLP
2801 Via Fortuna Drive, Suite 300
Austin, Texas 78746
meady@thompsoncoe.com

This 12th day of May, 2025.

/s/Adam W. D'Anella

Adam W. D'Anella, Esq.
Assistant Attorney General
GA Bar No. 153016
Counsel for State of Georgia

Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
(404) 458-3536
adanella@law.ga.gov